

Policy and Procedures Manual FAQ
Frequently Asked Questions About Program Policies and Procedures
July – August 2002

QUESTION: When changes are made in the First Steps regulations, what am I required to follow if the regulation differs from a previously published "best practice guideline in the Policy and Procedures Manual?"

ANSWER: Best practice guidelines do not supersede program regulations. As a First Steps provider, you are responsible for adhering to the First Steps regulations. When in doubt, you should always refer to the First Step Administrative Regulations. You may also contact your Program Consultant. Changes to the policy and procedures manual will always lag behind changes to the regulations; therefore, program evaluators will monitor for compliance with state and federal regulations and laws.

QUESTION: Our IFSP team has been trying to anticipate a child's needs during the entire 6-month period of the IFSP. This means that we are including some services that the child doesn't currently need, but may need sometime during the six months. We are including these needs in the plan so that we won't have to do as many amendment meetings. Is this correct?

ANSWER: During the Office of Special Education Programs (OSEP) self-assessment (December 2001), we determined that approximately 80% of children enrolled in First Steps receive only half of the services on their IFSPs. This is cause for concern and has resulted in OSEP coming for a monitoring visit this fall.

When an IFSP is developed, this represents a "contract" with the family for those services. When a service is written on the IFSP, then it must be delivered or there must be an IFSP team meeting to remove the service. For example, if the child demonstrates she has achieved the desired level of development and a service on her IFSP is no longer needed then there must be a team meeting to remove that service. It is not appropriate for the IFSP to contain services that are not currently needed by the family or child. It must only provide for services which the IFSP team determines the family and child need at the time the IFSP is written.

QUESTION: My employer has asked that I limit the amount of time that I spend in IFSP team meetings. I thought that I was required to attend IFSP team meetings if I deliver a therapy. Who's right?

ANSWER: It is your professional obligation and a condition of your contract as a First Steps provider that you participate in all of the child's IFSP team meetings.

If it is determined that a provider is not fulfilling their obligation to attend IFSP team meetings, then their contract is subject to cancellation. This applies to agency contracts as well as independent provider contracts.

QUESTION: I have been asked to backdate a referral for Primary Level Evaluation so that the clinic can bill First Steps for an evaluation that was done before I received the child and family's referral. Should I do this?

ANSWER: Absolutely not. The date of the referral is the date that the POE is called. First Steps does not pay for an evaluation done before a referral is received on that child.

QUESTION: I am a registered nurse with a BSN who is acting as a developmental interventionist for First Steps. How do I sign my staff notes?

ANSWER: Because you are practicing as a development interventionist when you delivered the service, you would sign your notes as a DI. You may also include your educational credentials if you like (e.g., BSN), but you would not follow your signature with an RN since you are not delivering the service in a nursing capacity.

QUESTION: I was told that I couldn't bill First Steps if I attend an ARC meeting even though it was held immediately after the IFSP meeting?

ANSWER: You can only submit a bill for an ARC meeting if it is "blended" with the IFSP meeting and the IFSP is discussed along with ARC. If two separate meetings are scheduled such as the IFSP from 8:00-8:30 and the ARC meeting from 8:30-9:00, then you can only bill for your participation in the IFSP meeting.

QUESTION: Is a medical exam required as part of the Primary Level Evaluation? If so, does First Steps pay for it?

ANSWER: 911 KAR 2:120 E specifies that the primary level evaluation will include a medical component completed by a physician or nurse practitioner that includes: a history and physical examination and a hearing and vision screening. For children under twelve (12) months of age, the evaluation shall have been performed within three months prior to referral to First Steps; for children twelve months to three years of age, evaluations must have been performed within six months prior to the referral to First Steps.

The First Steps program must be the payor of last resort. If you have exhausted all avenues for procuring the medical exam (through sources such as private insurance, Medicaid/KCHIP, the local health department or a federally funded primary care center) the First Steps program can pay for the medical exam. You must contact Carolyn Robbins (by email through this link or by phone at 502/595-4459, ext. 250) for prior authorization.

If you have a question that you would like to see addressed in the future on the Department for Public Health "Frequently Asked Questions" web page, send to: Theresa.Glore@ky.gov.